

2. Denied. To the extent that the allegations contained in this paragraph, concerning plaintiff's status as a licensed attorney constitute conclusions of law, no response is required and,

accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

3. Denied. To the extent that the allegations contained in this paragraph, concerning defendant Fay's status as a resident of a particular state constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

4. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

5. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

6. Denied. To the extent that the allegations contained in this paragraph, concerning defendant Perles' status as a resident of a particular state constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

7. Denied; admitted in part. To the extent that the allegations contained in this paragraph, concerning Fay and Perles' status as licensed attorneys constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted upon information and belief that Fay and Perles are both attorneys licensed to practice law in the District of Columbia.

8. Denied; admitted in part. To the extent that the allegations contained in this paragraph, concerning the status of F&P as a partnership constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted upon information and belief that F&P is a law firm.

9. Denied. To the extent that the allegations contained in this paragraph, concerning the structure and composition of F&P constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

10. Denied; admitted in part. To the extent that the allegations contained in this paragraph, concerning answering defendant's resident status constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted that answering defendant is a resident of the Commonwealth of Pennsylvania and it is also admitted that answering defendant has offices in Pennsylvania and New York. Answering defendant does not have an office in New Jersey.

11. Denied; admitted in part. To the extent that the allegations contained in this paragraph, concerning answering defendant's status as a licensed attorney constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted that answering defendant is an attorney licensed to practice law in Pennsylvania and New York. Answering defendant is not admitted to practice in New Jersey.

12. Denied; admitted in part. To the extent that the allegations contained in this paragraph, concerning LaSpada's status as a licensed attorney constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted upon information and belief that LaSpada is an attorney licensed to practice law in the State of Florida.

13. Denied. To the extent that the allegations contained in this paragraph, concerning defendant LaSpada's status as a licensed attorney constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

14. Denied. To the extent that the allegations contained in this paragraph, concerning the alleged amount in controversy constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, answering defendant denies that there is currently any amount in controversy because no funds have been turned over in the underlying litigation.

15. Denied. The allegations contained in this paragraph, concerning alleged diversity constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

16. Denied. The allegations contained in this paragraph, concerning this Court's jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

ALLEGED IN REM JURISDICTION

17. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

18. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted upon information and belief.

23. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Peterson Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

24. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

25. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied. By way of further response, the alleged agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

26. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied. By way of further response, the alleged agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

27. Admitted.

28. Admitted.

29. Admitted.

30. Denied; admitted. To the extent that the allegations contained in this paragraph, concerning the Court's alleged jurisdiction constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, it is admitted that the collection actions were brought in the United States District Court for the Southern District of New York.

31. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

32. Denied. The allegations contained in this paragraph, concerning alleged *in rem* jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

33. Denied. The allegations contained in this paragraph, concerning alleged *in rem* jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

34. Denied. The allegations contained in this paragraph, concerning alleged *in rem* jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

ALLEGED PERSONAL JURISDICTION

35. Admitted.

36. Denied. The allegations contained in this paragraph, concerning personal jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

37. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations set forth in this paragraph and, accordingly, they are denied.

38. Admitted.

39. Denied as alleged. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the “likelihood” of whether the NY

Turnover Proceedings will result in hundreds of millions of dollars in New York assets being paid to Defendants. By way of further response, the relevant judgments and fee agreements are writings that should be examined for their content. To the extent that plaintiff mischaracterizes the content of the writings, answering defendant denies the mischaracterizations.

40. Denied as alleged. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the number of court appearances or number of papers filed or whether Defendants will be “enriched” by several hundred million dollars.

41. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

42. Denied. The allegations contained in this paragraph, concerning personal jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

43. Denied. The allegations contained in this paragraph, concerning personal jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

44. Denied. The allegations contained in this paragraph, concerning personal jurisdiction constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

GLENN'S ALLEGED AGREEMENTS WITH F&P AND FAY

45. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

46. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

47. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

48. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

49. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

50. Denied as stated. It is admitted only that answering defendant has rights to certain legal fees and denies that Glenn has rights to any portion of those fees.

51. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE SOMMERHOF PLAINTIFFS

52. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Sommerhof Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

53. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

54. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

55. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

56. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

57. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

58. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

59. Admitted upon information and belief.

60. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE HELMS PLAINTIFFS

61. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Helms Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

62. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

63. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

64. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

65. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

66. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

67. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

68. Admitted upon information and belief.

69. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE LIVINGSTON PLAINTIFFS

70. Denied.

71. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

72. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

73. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

74. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

75. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

76. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

77. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a

writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

78. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

79. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

80. Admitted upon information and belief.

81. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

82. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

83. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE SCOTT PLAINTIFFS

84. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Scott Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent

that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

85. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

86. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

87. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

88. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

89. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

90. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

91. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

92. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

93. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

94. Admitted upon information and belief.

95. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

96. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

97. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE BELMER PLAINTIFFS

98. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Belmer Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

99. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

100. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

101. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

102. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

103. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

104. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the

complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

105. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

106. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

107. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

108. Admitted upon information and belief.

109. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

110. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

111. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE STURGHILL PLAINTIFFS

112. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Sturghill Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

113. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

114. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

115. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

116. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

117. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

118. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

119. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

120. Admitted upon information and belief.

121. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE WOOLLETT PLAINTIFFS

122. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Woollett Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

123. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

124. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

125. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

126. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

127. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

128. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

129. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

130. Admitted upon information and belief.

131. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE PHILLIPS PLAINTIFFS

132. Denied.

133. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

134. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

135. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

136. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

137. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

138. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

139. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

140. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

141. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

142. Admitted upon information and belief.

143. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

144. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

145. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE YOUNG PLAINTIFFS

146. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Young Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

147. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

148. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

149. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

150. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

151. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

152. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

153. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

154. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

155. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

156. Admitted upon information and belief.

157. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

158. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

159. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE SWINSON PLAINTIFFS

160. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Swinson Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

161. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

162. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

163. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

164. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

165. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

166. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

167. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

168. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

169. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

170. Admitted upon information and belief.

171. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

172. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

173. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE MOORE PLAINTIFFS

174. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Moore Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

175. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

176. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

177. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

178. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

179. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

180. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

181. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

182. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

183. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

184. Admitted upon information and belief.

185. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

186. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

187. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE WHEELER PLAINTIFFS

188. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Wheeler Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

189. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

190. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

191. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

192. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

193. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

194. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

195. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

196. Admitted upon information and belief.

197. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE THORSTAD PLAINTIFFS

198. Denied.

199. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

200. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

201. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

202. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

203. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the

complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

204. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

205. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

206. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

207. Admitted upon information and belief.

208. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

209. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

210. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE OLSON PLAINTIFFS

211. Denied as stated. It is admitted only that answering defendant along with Fay & Perles entered into a fee agreement for certain of the Olson Plaintiffs. By way of further response, the fee agreement is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

212. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

213. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

214. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

215. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

216. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

217. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

218. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied. By way of further response, the alleged report is a writing that should be examined for its content. To the extent that plaintiff mischaracterizes the content of the writing, answering defendant denies the mischaracterizations.

219. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

220. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

221. Admitted upon information and belief.

222. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

223. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

224. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

THE SUBSEQUENT PETERSON COLLECTION ACTIONS

225. Admitted.

226. Admitted.

227. Admitted.

228. Denied. To the extent that the allegations contained in this paragraph, concerning an alleged charging lien constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the likelihood of Defendants' recovery of several hundred million dollars.

229. Denied. To the extent that the allegations contained in this paragraph, concerning plaintiff's status as a resident for purposes of establishing diversity jurisdiction constitute conclusions of law, no response is required and, accordingly, all such allegations are denied. To the extent that this paragraph contains allegations of fact, after reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the truth of those allegations and, accordingly, they are denied.

230.

DEFENDANT'S DISPUTE OF GLENN'S ALLEGED CHARGING LIEN

231. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

232. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

233. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

234. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

235. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

236. Denied. The allegations contained in this paragraph, concerning an alleged justiciable controversy constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

ALLEGED COUNT I

237. Answering defendant repeats its answers to all preceding paragraphs as if set forth fully herein.

238. Denied. The allegations contained in this paragraph, concerning an alleged declaratory judgment constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

239. Denied. The allegations contained in this paragraph, concerning an alleged charging lien constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

ALLEGED COUNT II

240. Answering defendant repeats its answers to all preceding paragraphs as if set forth fully herein.

241. Denied; admitted in part. Answering defendant denies claiming to have referred the following plaintiffs listed in this paragraph to F&P:

Estate Joseph R. Livingston
Tia Fox
Estate of John Phillips, Sr.
Elizabeth P. Moy
Victoria Jacobus
Harold Phillips
Adam Thorstad
James Thorstad, Jr.
Patricia Thorstad Zosso
Ryan Thorstad
Kathryn Thorstad
John Thorstad
Janice Thorstad
Barbara Thorstad
Kathleen Hedge

Answering defendant admits to having a fee agreement for all other plaintiffs listed in this paragraph along with Fay & Perles and, accordingly, answering defendant claims entitlement to a fee for such plaintiffs.

242. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

243. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

ALLEGED COUNT III

244. Answering defendant repeats its answers to all preceding paragraphs as if set forth fully herein.

245. Admitted.

246. Admitted.

247. Admitted.

248. Admitted.

249. Admitted.

250. Admitted.

251. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

252. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

253. Denied. After reasonable investigation, answering defendant is without sufficient knowledge or information to form a belief as to the allegations set forth in this paragraph of the complaint and, accordingly, they are denied.

254. Denied. The allegations contained in this paragraph, concerning plaintiff's alleged entitlement constitute conclusions of law to which no response is required and, accordingly, all such allegations are denied.

WHEREFORE, answering defendant, Allen L. Rothenberg, respectfully requests the following relief:

1. Judgment in his favor and against plaintiff on the claims set forth in the second amended complaint;
2. An award of attorneys' fees and costs of suit incurred in the defense of this action; and
3. Such other relief as the Court deems just and proper.

FIRST AFFIRMATIVE DEFENSE

Plaintiff's complaint fails to state claims against answering defendant upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred because there is no actual case or controversy.

THIRD AFFIRMATIVE DEFENSE

Plaintiff is not in privity with answering defendant.

FOURTH AFFIRMATIVE DEFENSE

Answering defendant owes no duty to plaintiff.

FIFTH AFFIRMATIVE DEFENSE

Answering defendant has not breached any contractual or common law duty owed to plaintiff.

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrine of unclean hands.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by his own conduct and negligence.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of waiver and/or estoppel.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part, due to lack of consideration.

FOX ROTHSCHILD LLP

By: /s/ John A. Wait (JW 2558)

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